

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DAILY NEWS, LP; CHICAGO TRIBUNE :
COMPANY, LLC; ORLANDO SENTINEL : No. 1:24-cv-03285-SHS
COMMUNICATIONS COMPANY, LLC; :
SUN-SENTINEL COMPANY, LLC; SAN :
JOSE MERCURY-NEWS, LLC; DP MEDIA :
NETWORK, LLC; ORB PUBLISHING, :
LLC; AND NORTHWEST :
PUBLICATIONS, LLC, :
:
Plaintiffs, :

v.

MICROSOFT CORPORATION, OPENAI,
INC., OPENAI LP, OPENAI GP, LLC,
OPENAI, LLC, OPENAI OPKO LLC,
OPENAI GLOBAL LLC, OAI
CORPORATION, LLC, OPENAI
HOLDINGS, LLC,

Defendants.

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MOTION TO ADMIT COUNSEL *PRO HAC VICE*

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, Rose S. Lee hereby moves this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Defendants OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC and OpenAI Holdings, LLC.

I am good standing for the bar of the State of California and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the declaration pursuant to Local Rule 1.3.

Dated: October 22, 2024

MORRISON & FOERSTER LLP

By: /s/ Rose S. Lee

Rose S. Lee (*pro hac vice pending*)

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OPCO LLC, OPENAI GLOBAL LLC,

OAI CORPORATION, LLC, and

OPENAI HOLDINGS, LLC